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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

OLAMIDE YUSUF BAKARE,

Defendant.

CASE NO. 2:21-CR-0237 DAD-3

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: January 17, 2023
TIME: 9:30 a.m.
COURT: Hon. Dale A. Drozd

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and the above-captioned defendant, by and through his respective counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for change of plea on January 17, 2023, with the Honorable Dale A. Drozd.

2. By this stipulation, Defendant Olamide Yusuf Bakare now moves to continue the hearing to January 18, 2023, at 9:30 a.m. The defendant and the government (the “parties”) also jointly move to exclude time between January 17, 2023, and January 18, 2023, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes over 36,700 items and pages of law enforcement reports, EDD records, bank records, witness statements, photographs, audio recordings, search warrant items, fraud loss reports,

1 images of debit cards, ATM footage, cellular phone extractions, and criminal histories. The
2 discovery also includes Cellebrite reports for the cellular phones of all three defendants. All this
3 discovery has been either produced directly to counsel and/or made available for inspection and
4 copying.

5 b) Counsel for defendant desires additional time to consult with her client, to review
6 the current charges, to conduct investigation and research related to the charges, to review
7 discovery for this matter, to discuss potential resolutions with her client, and to otherwise prepare
8 for trial. Much of these efforts have been difficult and delayed given the COVID-19 pandemic
9 across the country and the distance between all three defendants and their counsel. For example,
10 Defendant Bakare resides in or near Maryland, whereas his counsel resides in the Eastern
11 District of California.

12 c) Counsel for defendant believes that failure to grant the above-requested
13 continuance would deny them the reasonable time necessary for effective preparation, taking into
14 account the exercise of due diligence.

15 d) The government does not object to the continuance.

16 e) Based on the above-stated findings, the ends of justice served by continuing the
17 case as requested outweigh the interest of the public and the defendant in a trial within the
18 original date prescribed by the Speedy Trial Act.

19 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
20 et seq., within which trial must commence, the time period of January 17, 2023 to January 18,
21 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
22 T4] because it results from a continuance granted by the Court at defendant's request on the basis
23 of the Court's finding that the ends of justice served by taking such action outweigh the best
24 interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: January 10, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ DENISE N. YASINOW
DENISE N. YASINOW
Assistant United States Attorney

Dated: January 10, 2023

/s/ CANDICE FIELDS
CANDICE FIELDS
Counsel for Defendant
OLAMIDE YUSUF BAKARE

ORDER

IT IS SO ORDERED.

Dated: January 10, 2023

Dale A. Droyd
UNITED STATES DISTRICT JUDGE